

DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

FOR THE MONTH OF:

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MONTHLY MONITORING RECORD PERMIT NUMBER COUNTY NAME OF FACILITY REGION COASTAL ENERGY CORP. MO-0136883 **HOWELL SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE

	:							
15	IRRIGATED	STORMWA"	TER	NO	IRRIGATED S	FORMWATER	FOR MONTH:	区
1	VOLUME IRRIGATED	APPLICATION AREA	APPLICATION RATE	ETHYL- BENZEN	OIL & GREASE	PETROLEUM HYDRO.,	рН	ETHANOL
DAY	GALLONS	ACRES	INCHES/ACRE	mg/L	mg/L	TOTAL mg/L	SU	mg/L
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Signature and	Tule of Individual Re	paring Report:		Date: 5/1/12	Phone Number: 4リワー4(ターユアリフワ	Email Address:	oastal-fine	. com
Signature of	vijer or Designee App	orlyoman		Date: (Phone Number:	Email Address;	Ciastal-	Ancom
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MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM

MONTHLY MONITORING RECORD

FOR THE MONTH OF: ___

May

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NAME OF FACILITY
COASTAL ENERGY CORP.

PERMIT NUMBER MO-0136883

COUNTY HOWELL REGION SERO

DUE BY: JANUARY 28TH

SAMPLES COLLECTED BY

ANALYSIS PERFORMED BY (LAB)

DATE

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DAY	VOLUME IRRIGATED	APPLICATION AREA	APPLICATION RATE	ETHYL- BENZEN	OIL & GREASE	PETROLEUM HYDRO., TOTAL	р Н	ETHANOL
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20	see yes			Date: 1/12	1417-469-2709	9arus co	astal-Ima	COM
naturë of	Owner or Designee App	proving Report:		Date: 1913	Phone Number:	Email Address		finc w



No.of Samp. Tot of Monthly Avg. Daily

Signature and Title of Individual Preparing Report:

MISSOURI DEPARTMENT OF NATURAL RESOURCES

DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

FOR THE MONTH OF:

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June	, 20 lo

MONTHLY MONITORING RECORD NAME OF FACILITY COUNTY PERMIT NUMBER REGION COASTAL ENERGY CORP. MO-0136883 HOWELL **SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE **IRRIGATED STORMWATER** NO IRRIGATED STORMWATER FOR MONTH: PETROLEUM HYDRO., OIL & GREASE APPLICATION APPLICATION ETHYL-VOLUME ETHANOL IRRIGATED AREA BENZEN RATE DAY TOTAL **GALLONS ACRES** INCHES/ACRE mg/L mg/L mg/L SU mg/L DAILY DAILY DAILY Once/month Once/month Once/month Once/month Once/month 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

Phone Number: 417-469-2997



DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

MONTHLY MONITORING RECORD

Signature of Owner or Designee Approving Report:

FOR THE MONTH OF:

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DAY	GALLONS	ACRES	INCHES/ACRE	mg/L	mg/L	TOTAL mg/L	SU	mg/L
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Max	Tielo Ler XIII and D]	<u> </u>	Detail	Phone Number	C-all Add	L	<u> </u>
Signature and	Title of Individual Pre	paring Report:	· 	Date: 8/6/12	Phone Number: 417-419-2777	Gary Oco	astal-finc.	com



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM

DUE BY: JANUARY 28TH

MONTHLY MONITORING RECORD

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FOR THE MONTH OF:

20 12

COUNTY NAME OF FACILITY PERMIT NUMBER REGION COASTAL ENERGY CORP. MO-0136883 HOWELL **SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE **IRRIGATED STORMWATER** NO IRRIGATED STORMWATER FOR MONTH: 🖾 APPLICATION APPLICATION PETROLEUM ETHANOL DAY IRRIGATED AREA RATE BENZEN GREASE HYDRO., TOTAL **GALLONS** ACRES INCHES/ACRE mg/L mg/L SU mg/L mg/L DAILY DAILY DAILY Once/month Once/month Once/month Once/month Once/month 2 3 5 6 7, 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 No.of Samp. Tot of Samp Monthly Avg Daily Signature and Title of Individual Preparing Report: Phone Number: Email Address: 4117-469-2777 Empil Address: Signature of Comer or Designee Approving Report: Date: Phone Number:



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM

DUE BY: JANUARY 28TH

MONTHLY MONITORING RECORD

FOR THE MONTH OF: September, 20 12 PERMIT NUMBER NAME OF FACILITY COASTAL ENERGY CORP. MO-0136883 **HOWELL SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE

	IKKIGATED	STORMWAT	EK	NO	O IRRIGATED STORMWATER FOR MONTH: 🔼					
DAY	VOLUME IRRIGATED	APPLICATION AREA	APPLICATION RATE	ETHYL- BENZEN	OIL & GREASE	PETROLEUM HYDRO.,	рН	ETHANOL		
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May F	Title oNndividual Pro	eparing Report:	<u> </u>	Date:	Phone Number:	Email Address:	L	1		
parure and Title of Individual Preparing Report: Director of Softer or Designee Approving Report: August Mostannea and				10/1/12	Phone Number: 417-464-2777	Email Address: Garu © coastal-Tmc.com Badail Address: C Wastal-Fmc. Co				



DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

FOR THE MONTH OF:

MONTHLY MONITORING RECORD COUNTY REGION NAME OF FACILITY PERMIT NUMBER **COASTAL ENERGY CORP.** MO-0136883 HOWELL **SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE

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Signature and Title orlindi	le of Individual Pre	eparing Report:		Date: 11/1/12	Phone Number: 417-413-27119 Phone Number: Same	Email Address:	sastal-tw	1c.com
Signature of Owner or Des	er or Designee App	proving Report:		Date 1913	Phone Number:	Email Address:	100541	ma arong



DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

MONTHLY MONITORING RECORD

FOR THE MONTH OF: November

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COUNTY REGION PERMIT NUMBER NAME OF FACILITY **COASTAL ENERGY CORP.** MO-0136883 HOWELL **SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE

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Energie and	THE OF INCIDIO PRINT	грапід кероп: N. X.		Date: 12/3/12	Phone Number: 417-469-2011の	G G TIN W.C.E	sastal-finc. 20 astal-t	tom



DUE BY: JANUARY 28TH

WATER POLLUTION CONTROL PROGRAM

FOR THE MONTH OF:

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MONTHLY MONITORING RECORD COUNTY NAME OF FACILITY PERMIT NUMBER REGION COASTAL ENERGY CORP. MO-0136883 HOWELL **SERO** SAMPLES COLLECTED BY ANALYSIS PERFORMED BY (LAB) DATE

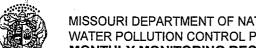
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MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM MONTHLY MONITORING RECORD

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enature of	ure of Super or Designee Approving Report: Date: Phone No. 10 Phone N						er: <u>417-4</u>	61- d'1	7'1	Email Addr	coastal Coastal Coasta	imc.co	
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DAY 1	Rainfall Inches DAILY	Volume Pumped Gallons	Rainfall Inches	Volume Pumped Gallons	Rainfall Inches	Volume Pumped				10 <u>12</u>	June 2	20 12
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Signature and Ti	itle of Individ	ual Preparing l	Report:		Date: 6/1/12 Date: 19/13	Phone Numb	4G-277	D	•	Email Addres	ss: , i /	1

Phone Number: Return form to: Missouri Department of Natural Resources, Southeast Regional Office, 2155 North Westwood Blvd. Poplar Bluff MO 63901



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM

DUE BY: JANUARY 28TH

MONTHLY MONITORING RECORD NAME OF FACILITY PERMIT NUMBER COUNTY REGION COASTAL ENERGY CORP. MO-0136883 **HOWELL SERO OUTFALL: 002 OUTFALL: 001** July 20_/2_ August 20<u>12</u> September 20 12 July 20 12 August 20 12 September 20_/2 Rainfall Volume Rainfall Rainfall Rainfall Volume Rainfall Volume Pumped Pumped Pumped Pumped Pumped Pumped DAY Gallons Inches Gallons Gallons Inches Gallons Inches Gallons Inches Gallons Inches Inches 1 DAILY DAILY DATLY DAILY DAILY DAILY DAILY DAILY DAILY DAILY DAILY DAILY 6 1411 14" 2 3 4 3411 0 5 6 0 0 1 /4 11 4 7 1/4" 4/12/1 **P** 8 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 13 28 29 30 31 # No.of Samp. Tot of Email Address: 1 Cary (Occoastal-Tmc, com Signature and Title of Individual Preparing Report: nyr or Designee Approving Reports



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MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER POLLUTION CONTROL PROGRAM

MONTHLY MONITORING RECORD PERMIT NUMBER COUNTY REGION CÔASTAL ENERGY CORP. MO-0136883 HOWELL **SERO OUTFALL: 001 OUTFALL: 002** 11 October 2012 November 20 /2 December 20/2 October 20 / 2 November 2012 December 2012 1 Rainfall Volume Rainfall Rainfall Rainfall Volume Volume Volume Rainfall Volume Rainfall Volume Pumped Pumped Pumped Pumped Pumped Pumped DAY Inches Gailons Inches Gallons Inches Gallons Inches Gallons Inches Gallons Gallons DAILY DAILY DATLY DAILY DAILY DAILY DAILY DAILY DAILY DAILY DAILY DAILY 2 3 0 4 12" 5 8 6 7 8 9 14 4 1/4" 0 10 11 1// 0 0 12 13 40 10 0 6 14 6 15 16 17 4/10" 4/10" 0 0 3/10 18 3/10 O 8 19 0 1/2 0 20 21 22 0 3/0" 3/10/1 70" 23 0 0 24 0 1/2" 25 12" 26 0 27 D 20 Yo 28 29 30 **%**0 4/0 Ê 31 No.of Samp. Tot of Samp Daily Signature and Title of Individual Preparing Report: Email Address:

1/2/13

Signature of Owner or Designee Approving Report:

west Mortgomers

Attachment 5

Notice of Potential National Pollutant Discharge Elimination System (NPDES) PERMIT VIOLATIONS

Permittee (facility) Name and Address:

Coastal Energy Corporation P.O. Box 218, 1 Coastal Drive Willow Springs, MO 65793

NPDES Permit Number: MO0136883

During the Clean Water Act §308 compliance inspection conducted on <u>July 10, 2014</u>, the potential NPDES permit violations noted below were found. Additional violations may be brought to your attention following a complete review of the inspection report and other available information.

POTENTIAL NPDES PERMIT VIOLATIONS

- 1. Coastal Energy failed to prevent the discharge of stormwater into the Eleven Point River. Evidence of discharge were noted from two pipes (controlled discharge).
- 2. Coastal Energy failed to include a) average number of times per month the facility is checked to see if it is operating properly, and description of any unusual operating conditions encountered during the year; in the annual report submitted to MDMR as required by Note 2of the NPDES permit, b) the number of days the facility discharged during the year, the discharge flow, the reasons discharge occurred and effluent analysis performed.
- 3. Coastal Energy failed to develop a Stormwater Pollution Prevention Plan as required by Condition 7 of the NPDES permit.
- 4. Coastal Energy failed to develop and maintain an Operational and Maintenance Manual (O&M) as required by Condition 12 of the NPDES permit.
- 5. Coastal Energy failed to perform monthly visual inspection of the tank system to identify problems that could lead to leaks as required by Condition 13 of the NPDES permit. Coastal Energy started such inspection in February 2014 up to the date of this inspection.
- 6. Outfall OU001 and OU002 were not marked on site.

REQUESTED ACTION: Within ten (10) days, please describe in writing any actions taken, or planned, to correct the potential violations identified above. Your response will be considered in the determination of the need for further administrative or legal action. Mail your description of corrective actions to your inspector at: U.S. Environmental Protection Agency, ENSV/EFCB, 300 Minnesota Ave., Kansas City, KS, 66101

printed Name: Naji J. Ahmad Signature: Notice Received by: Cary Picard Signature: Signature: Joy March Date: 7-10-2014

Attachment 6

Aĥmad, Naji

From:

Gary Picard <gary@coastal-fmc.com>

Sent:

Thursday, July 17, 2014 4:02 PM

To:

Ahmad, Naji

Cc:

kelly@bossermanlaw.com; rebecca@spaethcom.com; David Montgomery

Subject:

Coastal Energy Corrective actions letter

Attachments:

Corrective actions letter to EPA.pdf; DSC00722.jpg; DSC00724.jpg; DSC00726.jpg;

DSC00729.jpg; DSC00730.jpg; DSC00731.jpg

Mr. Ahmad,

I have attached a letter describing the actions we are taking to correct the potential violations listed from your inspection on July 10, 2014. I have also attached photos of what was done to address issues #1 and #6 in the report. If you have any other questions please contact me.

Sincerely,

Gary Picard Coastal Energy Corp. P.O. Box 218 Willow Springs, MO 65793 P: 417-469-2777

F: 417-469-4497



Coastal Energy Corporation

1 Coastal Drive, Willow Springs MO 65793 Phone: (417) 469-2777 Fax: (417) 469-2294 www.coastal-fmc.com

7/17/14

Naji J. Ahmad Environmental Engineer Environmental Services Division Field Compliance Branch 300 Minnesota Ave. Kansas City, KS 66101

Actions taken to correct potential NPDES permit violations from July 10, 2014 inspection.

- 1. The discharge noted from the two outfalls was the result of an incomplete seal in the discharge pipes and resulted in minimal loss from each outfall. The discharges likely infiltrated the soil before they reached the Eleven Point River. In an effort to mitigate future discharges from the pipes associated with the outfalls at the facility, Coastal Energy has capped and sealed the pipes to ensure that the drips discovered during the inspection will no longer discharge. This maintenance should fix what we believe to be a condensation issue found in one unused drainage pipe and the one drop of rainwater drainage per fifteen seconds, which was discovered coming from the other unused drainage pipe. When weather permits, the facility will be completely removing the pipes so that the likelihood of a discharge is minimized.
- 2. The facility recognizes the deficiency in not including the frequency of inspections for proper operation and a description of any unusual operating conditions in the annual report. The facility is currently, and has historically, checked for proper operation on a daily basis during normal operating hours and there have not been any identified unusual operating conditions. In the future we will ensure that the facilities inspection frequency and documentation of unusual occurrences will be included in the Annual Operating Report. The number of days that the facility discharged during the year, the discharge flow, the reason discharge occurred and effluent analysis performed was not included in the report because the facility was operating under the premise that a discharge had not occurred in any previous year. In the future, if a discharge occurs, the facility will include the appropriate documentation in the Annual Operating Report.
- 3. Coastal Energy provided a current Stormwater Pollution Prevention Plan during the inspection. The SWPPP was dated July 2014 and satisfies Condition 7 of the NPDES permit. The facility is currently in the process of implementing the SWPPP and will document all appropriate requirements.



Coastal Energy Corporation

1 Coastal Drive, Willow Springs MO 65793
Phone: (417) 469-2777 Fax: (417) 469-2294
www.coastal-fmc.com

4. Coastal Energy is currently preparing an Operations and Maintenance manual to use in conjunction with the facility's SWPPP as required by Condition 12 of the facility's SWPPP. The anticipated date of implementation for the Operations and Maintenance Manual is 90 days from the date of this letter.

5. Coastal Energy has regularly been performing monthly visual inspections since February 2014. The facility has implemented a Spill Prevention, Control, & Countermeasures Plan (SPCCP) that identifies the details of the monthly inspections of the tank systems and has been designed from the recommendations of the Steel Tank Institute and satisfies standard industry practices. The facility will continue to inspect the tank systems and document the inspections in the facility's SPCCP and SWPPP appropriately.

6. Outfall 001 and Outfall 002 have been appropriately marked and identified at the facility.

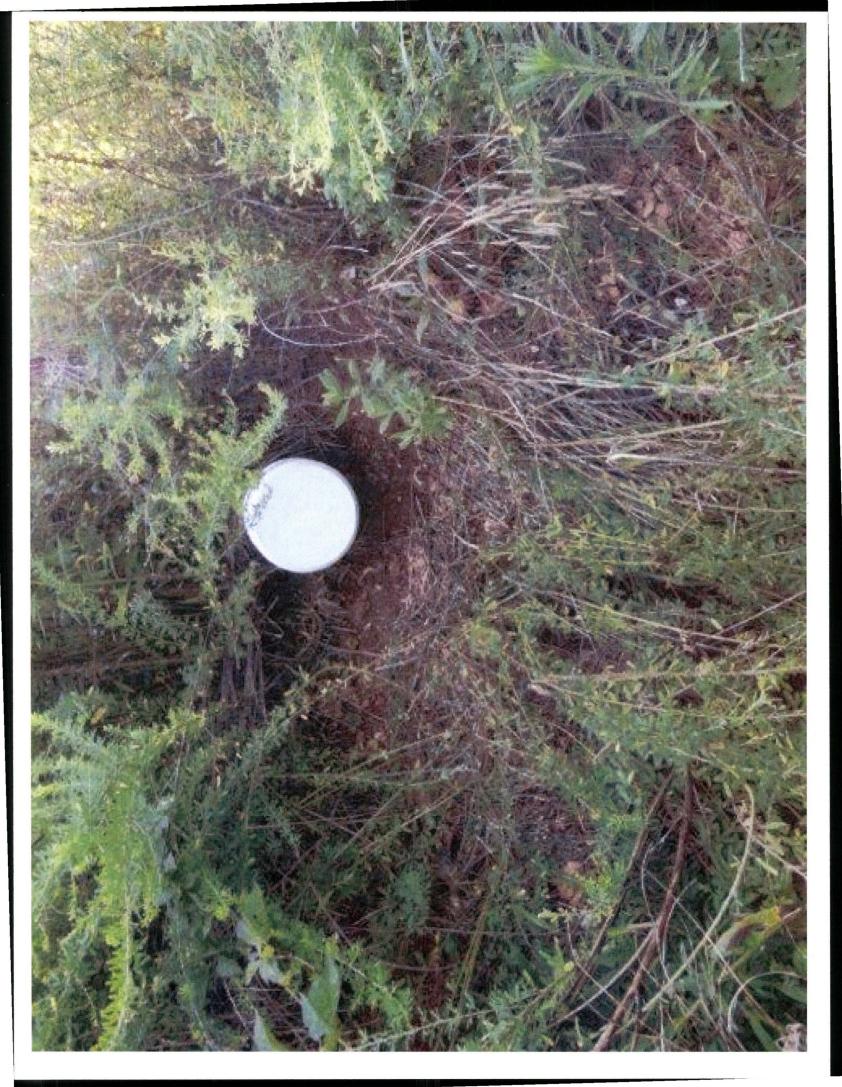
If there are any questions please call me.

Sincerely,

Gary Picard Coastal Energy Corp.

P.O. Box 218 Willow Springs, MO 65793

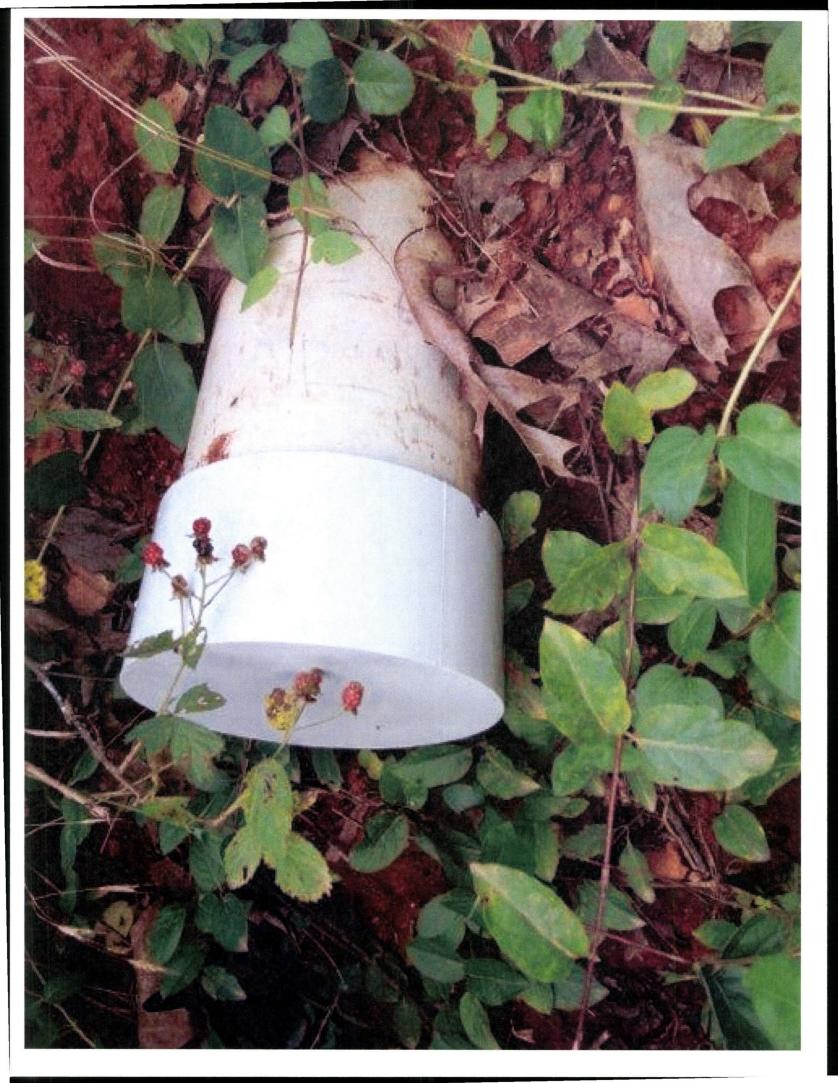
P: 417-469-2777 F: 417-469-4497

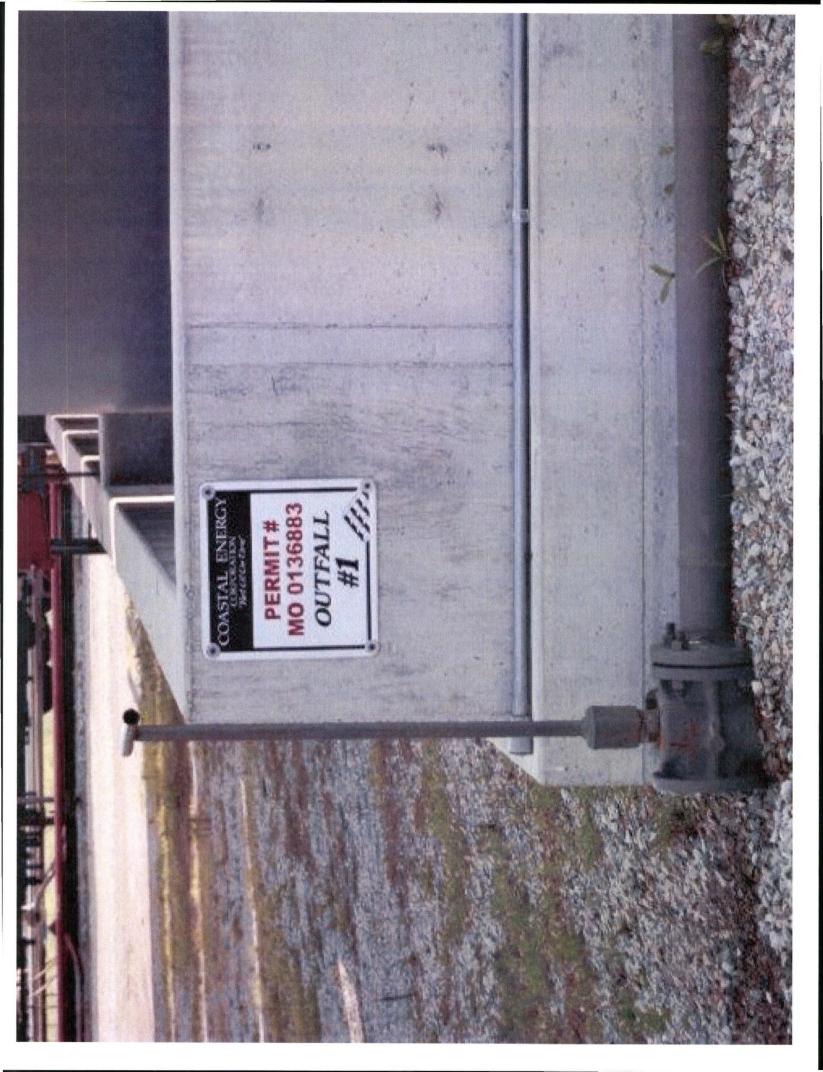


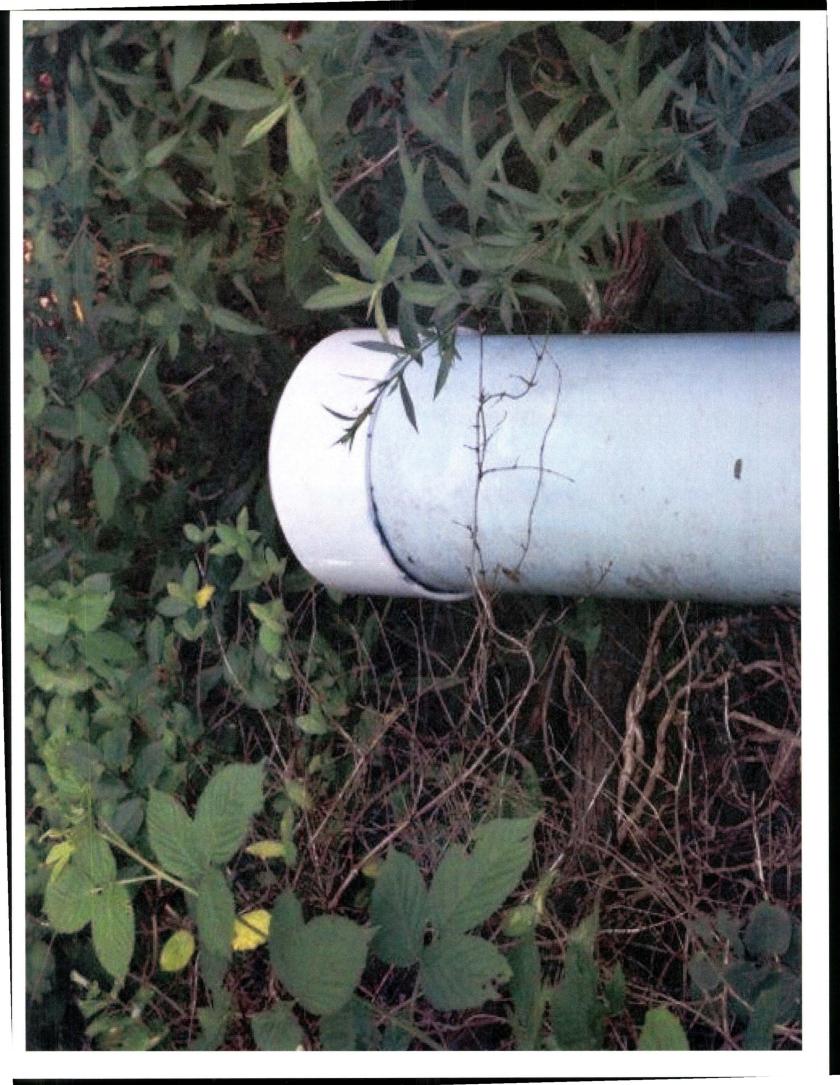


COASTAL ENERGY CORPORATION THAT CHEEN THE

PERMIT#
MO 0136883
OUTFALL
#2







Attachment 7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CONFIDENTIALITY NOTICE

Facility Name
Facility Address (1) Corporation
134 Burnham Road W. How Springs, Mo. 65793 Inspector (print)
Naji J. Ahmad
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 Date 7-10-7014
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met: 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures. 2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.
Information that you claim confidential will be held as such pending a determination of applicability by EPA.
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.
Facility Representative Provided Notice (print) Signature/Date
David Montgeniery 7/10/2014
Warrit Meritgeries
I have received this Notice and <u>DO</u> want to make a claim of confidentiality.
Facility Representative Provided Notice (print) Signature/Date
Information for which confidential treatment is requested;
(Rev: 11/15/99)

Attachment 8

Photo log:

DSCN 2111-DSCN2115 DSCN2116	The Elven Point River practices OU001as identified by the NPDES which is the discharge pipe from the ethanol secondary containment
DSCN2117	ethanol secondary containment
DSCN2118-DSCN2120	tank farm/ boiler and acid tank
DSCN2121-DSCN2124	Stromwater concrete structure with pump station & wet well
DSCN2125	liquids under cover
DSCN2126-DSCN2127	spill emergency response trailer
DSCN2128	boiler area and diesel tank in secondary containment
DSCN2129	access point well to pump out spills
DSCN2130	inlet pipe #1 that discharges into the Eleven Point River
DSCN2131-DSCN2135	the outlet of Pipe #1
DSCN2136	unnamed tributary #1
DSCN2137	40 acres open field irrigation field
DSCN2138	vehicle parking on the banks of the River no evidence of spills
DSCN2139	bottom of the River where vehicles are parked
DSCN2140	same as DSCN2138
DSCN2141-DSCN2147	grading of the eleven Point River and the road crossing
DSCN2148-DSCN2149	storage area
DSCN2150	general random video was deleted by inspector
DSCN2151	Retention Basin
DSCN2152	inlet of pipe #4
DSCN2153	looking at pipe #5 inlet near pipe #4 inlet
DSCN2154	Pipe #5 inlet
DSCN2155-DSCN2156	Pipe #5 outlet into the unnamed tributary #1
DSCN2157	near outlet of pipe #5
DSCN2158	Pipe #3 outlet into the unnamed tributary #1
DSCN2159	Pipe #3 inlet
DSCN2160	Pipe #2 inlet
DSCN2161	unnamed tributary #1
DSCN2162-DSCN2164	Pipe #2 outlet into the unnamed tributary #1



